

## West Virginia Executive Branch Privacy Tip of the Week

### Business Continuity Planning (BCP)

#### Question:

My supervisor recently went to a workshop on continuity of operations or continuity planning (or something like that.) What's that all about and is it really important?

#### Answer:

Business continuity planning (BCP) is the process of developing a comprehensive written plan to maintain critical business processes during a disruption, such as a flood or other disaster, and restoring functionality back to normal processing after a disruption has occurred. BCP enables a business to continue *critical* operations in the event of a disastrous interruption to activities. Creating effective plans requires rigorous planning, documentation, training, and testing.

Privacy Officers should participate in the BCP process to help ensure that privacy considerations are addressed. Do not let privacy be an additional casualty of the event.

Here are some points to consider in the BCP process:

- ✓ Planning for and managing incidents necessarily involves personally identifiable information (PII.) Some types of events, such as a pandemic (Avian Flu, H1-N1, etc.), may involve a great deal of very sensitive PII.
- ✓ BCP planning likely requires collection of PII about key personnel, including contact information, information about their family situations, and location. Employee medical information, such as disability or special needs, may also need to be collected.
- ✓ Consider PII needed internally as well as PII that might need to be shared with external parties.
- ✓ Remember that your security and privacy controls should be maintained during an event. Just because you are processing out of a temporary facility does not mean that your controls over data and physical access should be eliminated.
- ✓ Focus on privacy and security controls over data recovery and data transmission. For example, employees may need remote access to data in a back-up data center. The BCP should address these situations.
- ✓ Various components of a business continuity plan can have significant privacy concerns. Consider the privacy implications of distributing a "call tree" of key personnel to all employees.

- ✓ Risk-based decisions involving PII will still have to be made during an event, but proper planning helps reduce the number of decisions having to be made on the fly, which in turn helps reduce the risk to the organization.